



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

AAS/SME/LB/CJN
F. #2019R01145

*271 Cadman Plaza East
Brooklyn, New York 11201*

May 18, 2020

By Email and ECF

Moe Fodeman, Esq.
Wilson Sonsini Goodrich & Rosati, PC
1301 Avenue of the Americas
40th Floor
New York, NY 10019

Re: United States v. Bo Mao
Criminal Docket No. 19-392 (PKC)

Dear Mr. Fodeman:

Enclosed please find the government's seventh production of discovery in accordance with Rule 16 of the Federal Rules of Criminal Procedure ("FRCP 16"). This discovery supplements the government's previous productions dated January 22, 2020; February 3, 2020; February 11, 2020, February 28, 2020; March 3, 2020, and March 5, 2020. The discovery is being produced pursuant to the Protective Order entered by the Court on January 10, 2020. See ECF Docket Entry No. 30. Draft transcripts and translations are produced pursuant to the parties' stipulation regarding the same. See EC Docket Entry No. 49. Certain identifying terms used herein are defined in the complaint in this matter. See United States v. Bo Mao, 4:19-MJ-647 (N.D.Tex.). The government also requests reciprocal discovery from the defendant.

The enclosed discovery consists of the following:

	Document Description	Category of Discovery Pursuant to Protective Order	Bates Range
1	Draft transcript of the defendant's post-arrest statement	Discovery Material ("DM")	DOJ_MAO_A_0003770490 - DOJ_MAO_A_0003770553
2	Documents from financial institutions	DM	DOJ_MAO_A_0003770554 – DOJ_MAO_A_0003770732
3	Documents from the Victim Company	Sensitive Discovery Material ("SDM")	DOJ_MAO_A_0003770733 – DOJ_MAO_A_0003774454
4	Draft transcripts and translations of recordings from the Mansfield Law Enforcement Center in Mansfield, Texas	DM	DOJ_MAO_A_0003774455 – DOJ_MAO_A_0003774510
5	Documents from a venture capital firm	SDM	DOJ_MAO_A_0003774511 – DOJ_MAO_A_0003774597
6	Documents from the Texas University	DM	DOJ_MAO_A_0003774598 – DOJ_MAO_A_0003774631
7	Documents from the Victim Company	DM and SDM (<u>See</u> Attachment 1)	DOJ_MAO_A_0003774632 – DOJ_MAO_A_0003793258

Very truly yours,

RICHARD P. DONOGHUE
United States Attorney

By: /s/ Sarah M. Evans
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JAY I. BRATT
Chief, Counterintelligence and Export
Control Section
National Security Division, U.S. Department
of Justice

By: /s/ Thea D. R. Kendler
Thea D. R. Kendler
David Lim
Trial Attorneys

cc: Clerk of the Court (PKC) (by ECF) (without Enclosures)

PRODUCTION BEGDOC	PRODUCTION ENDDOC	DISCOVERY TYPE
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